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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

17  
18 UNITED STATES OF AMERICA *ex rel.*  
19 CECILIA GUARDIOLA,

20 *Plaintiff/Relator,*

21 *v.*

22 RENOWN HEALTH,  
23 RENOWN REGIONAL MEDICAL CENTER,  
24 and RENOWN SOUTH MEADOWS  
25 MEDICAL CENTER,

*Defendants.*

Case No. 3:12-cv-00295-LRH-VPC

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

26 Pursuant to Local Rule 26-4, Relator Cecilia Guardiola (“Relator”) and the United States  
27 of America (“Government”) by and through their counsel, hereby stipulate and request that this  
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1 Court extend the discovery deadlines in the above-captioned case by ninety (90) days. The  
2 current close of discovery is May 25, 2018, and the Parties seek an extension to August 24,  
3 2018.

4 This is the Parties' first request to extend the discovery deadlines. In support of this  
5 Stipulation, the Parties state as follows.

6 **A. REASONS WHY DISCOVERY WAS NOT COMPLETED**

7 Relator served requests for production and interrogatories on the Government on  
8 November 27, 2017. The Government initially responded to the interrogatories and requests for  
9 production on January 12, 2018. On January 24, 2018, Relator served her second set of  
10 interrogatories on the Government. The Government responded to the second set of  
11 interrogatories on March 16, 2018.

12 The Parties have met and conferred multiple times regarding the Government's responses  
13 to Relator's requests for production and interrogatories. Through the course of those discussions,  
14 the Government has agreed to supplement or produce additional documents. Part of that  
15 production has required the Government to work with an outside contractor to provide  
16 documents, particularly email communications. The Government has initially selected the  
17 custodians and search terms to use to retrieve emails that it believes are relevant to the  
18 underlying litigation, in particular, the Government's efforts to recover from Renown Health,  
19 Renown Regional Medical Center, and Renown South Meadows Medical Center (collectively,  
20 "Renown"). Relator has reserved the right to seek emails from additional custodians or using  
21 additional search terms.

22 Last week, the Government received 11GB of emails from its contractor. The  
23 Government requires time to conduct a privilege review of these documents before production.  
24 While the Government has suggested that it will provide a rolling production of documents, it  
25 has not yet provided a timeline for that production to be completed. Relator will then need time  
26 to review the emails that have been produced. It is unclear at this time when the Government will  
27 be able to begin its rolling production and how much time Relator may require to complete her  
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1 review. It is clear, though, that discovery will not be completed by May 25, 2018. Accordingly,  
2 there is good cause to grant this extension of the discovery deadlines at this point.

3 **B. DISCOVERY COMPLETED TO DATE**

4 The following discovery has been completed:

- 5 1. Relator sent interrogatories and requests for production to the Government on  
6 November 27, 2017. The Government responded on January 12, 2018.
- 7 2. Relator sent her second set of interrogatories on January 24, 2018. The  
8 Government responded on March 16, 2018.
- 9 3. The Government has received initial search results of email searches from the  
10 Government's contractor and is reviewing them for privilege.

11 **C. DISCOVERY THAT REMAINS TO BE COMPLETED**

12 The following discovery remains to be completed:

- 13 1. The Government will complete review and production of emails.
- 14 2. Relator will need time to review the email production.
- 15 3. Depositions may need to be scheduled.

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**D. PROPOSED SCHEDULE**

Accordingly, the Parties propose the following schedule:

Event	Current Deadline	Proposed New Deadline
Close of Discovery on Motion	May 25, 2018	August 24, 2018
Relator to amend or supplement Motion	June 22, 2018	September 24, 2018
Government to file response	July 13, 2018	October 15, 2018
Relator to file reply	July 27, 2018	October 29, 2018

Dated May 2, 2018.

/s/Nathan G. Kanute

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Dated May 2, 2018.

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/s/ Roger Wenthe

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*Counsel for United States of America*

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGEDate: May 4, 2018

**CERTIFICATE OF SERVICE**

I certify that on May 2, 2018, a copy of the foregoing Stipulation and Order to Extend Discovery Deadlines was filed electronically and service was accomplished automatically to all counsel of record through the Notice of Electronic Filing (NEF) issued by the district court's Electronic Case Filing (ECF) System.

/s/ Lara J. Taylor

Lara J. Taylor

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